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1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS  
3

4 \_\_\_\_\_ )  
INA STEINER, DAVID STEINER, )  
5 and STEINER ASSOCIATES, LLC, )  
 )  
6 Plaintiffs, )  
 )  
7 vs. ) No. 1:21-CV-11181-PBS  
 )  
8 eBay INC., et al., )  
 )  
9 Defendants. )  
 )  
10 \_\_\_\_\_ )  
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12

13 CONFIDENTIAL  
14 VIDEOTAPED DEPOSITION OF DANIEL CORY  
15 San Jose, California  
16 Friday, September 6, 2024  
17 Volume I  
18  
19  
20

21 Reported by:  
CATHERINE A. NOLASCO, RMR, CRR, BS  
22 CSR No. 8239  
23 Job No. 6883657  
24  
25 PAGES 1 - 144

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14 Videotaped deposition of DANIEL CORY,  
15 Volume I, taken on behalf of Defendants, with the  
16 Witness appearing at eBay, 2025 Hamilton Avenue, San  
17 Jose, California, beginning at 9:24 a.m. and ending  
18 at 1:20 p.m., on Friday, September 6, 2024, before  
19 CATHERINE A. NOLASCO, Certified Shorthand Reporter  
20 No. 8239.  
21  
22  
23  
24  
25

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1 Q Could you -- could you provide the name of  
2 the sports franchise and also the dates that you  
3 worked --

4 A Yes --

5 Q -- there?

6 A -- from 2011 through 2017, I was the vice  
7 president of security for the San Francisco 49ers.

8 Q Okay. And then following that, in -- in  
9 2017, is that when you joined eBay?

10 A Correct.

11 Q Okay. Until what year?

12 A 2021.

13 Q Okay. And then I believe you said that  
14 you -- can you tell me again what you went back to  
15 after leaving eBay?

16 A I formed a business, and we run a security  
17 company now.

18 Q Okay. Do you currently work for the  
19 49ers?

20 A We have a number of clients. I'm not sure  
21 where I stand in terms of revealing those clients  
22 because there's obviously some confidentiality, but  
23 I do not -- I am not employed by the San Francisco  
24 49ers.

25 Q Okay. That's what I was getting at.

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1 A Yeah.

2 Q Thank you. All right.

3 Okay. So fair to say that you have  
4 extensive professional experience in both the public  
5 sector and the private sector in the worlds of  
6 security?

7 A Yes, correct.

8 Q Are you familiar with the types of  
9 security concerns that large international companies  
10 like eBay face?

11 A Yes, I am.

12 Q Are you familiar with the types of  
13 measures that those companies typically employ to  
14 address those security concerns?

15 A I am.

16 Q All right. Did you begin working at eBay  
17 in July of 2017?

18 A Yes, I believe that's the time frame.

19 Q What was your -- what was your title at --  
20 at eBay when you started?

21 A It was director of protective services.

22 Q Okay. And what department did you join at  
23 eBay?

24 A The global security team.

25 Q Global Security and Resilience department,

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1

[REDACTED]

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

Q Okay. You mentioned travel intelligence.

15

What is that?

16

[REDACTED]

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

Q Okay. In your experience, is it typical

25

for large international companies like eBay to

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1 the intelligence team, for a period of time, and I  
2 think the investigations and threat management  
3 team -- they also reported to me, and that covered  
4 things like workplace violence, user threats,  
5 internal investigations, that type of thing.

6 Q Okay. You mentioned the Global  
7 Intelligence Center, or the GIC.

8 When you began at eBay, were you  
9 responsible for managing the Global Intelligence  
10 Center?

11 A Yes, and I forget if that was immediately  
12 or shortly after I joined, but I took responsibility  
13 for that, yes.

14 Q What type of work was the Global  
15 Intelligence Center responsible for conducting?

16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24 Q And how was intelligence work conducted at  
25 eBay?

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1 A When you say "how," what do you mean?

2 Q What tools and methods were used?

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16 Q Okay. Is it typical, in your experience,  
17 for large international companies like eBay to  
18 employ people to conduct that sort of intelligence  
19 function?

20 A Yes, absolutely.

21 Q And what's the typical background and  
22 skill set of people who perform that work at eBay?

23 A I think generally -- at eBay, I would say  
24 it's a mixture of, you know, government and  
25 private-sector experience, generally people with a

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1 level. She was the manager over that GIC team.

2 Q Okay. And so does this email reflect a  
3 change in the management of the Global Intelligence  
4 Center?

5 A It does, yeah.

6 Q And what was the bottom line of that  
7 change?

8 A That it was going to now report directly  
9 in to Jim and no longer to me.

10 Q Okay. And so up until this point, you  
11 were responsible for the Global Intelligence Center,  
12 but Mr. Baugh was conveying here his decision to  
13 move that unit under his supervision --

14 A Yes.

15 Q -- is that correct?

16 A Mm-hmm.

17 Q Okay. And did you understand from this  
18 message -- and, again, it says here: "Team -- I  
19 have made two significant changes" -- did you  
20 understand from this message that it was Mr. Baugh's  
21 decision to transfer the management of the Global  
22 Intelligence Center to him?

23 A Yes.

24 Q Okay. Now, you reported to Mr. Baugh when  
25 you joined eBay in July 2017, correct?



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1 A Correct.

2 Q And did you continue to report to  
3 Mr. Baugh after you were promoted to director of  
4 global operations?

5 A Yes, I did.

6 Q And approximately when did that promotion  
7 occur?

8 A I'm honest- -- I don't really recall. I'd  
9 also say, from a promotion, I was already a director  
10 level, so I don't believe -- it wasn't a change in  
11 status. It was just an alignment of a different set  
12 of responsibilities.

13 Q Okay. And during that entire period, you  
14 reported to Mr. Baugh, correct?

15 A Correct.

16 Q And who did Mr. Baugh report to?

17 A Wendy Jones.

18 Q What was her title?

19 A Chief operating officer, I think.

20 Q Okay.

21 MR. LISSAUER: I was, but now I can't hear  
22 anything. They took an extended break, and I can't  
23 hear anything.

24 THE VIDEOGRAPHER: Lawrence Lissauer.

25 MS. MILLS: Let's go off the record for a

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Q Okay. But that range of topics did not include stalking, harassing, or threatening people?

A Correct.

Q Did you ever have occasion to work directly with either Stephanie Stockwell or Veronica Zea in 2019?

A Yes. Yes, I did.

Q Okay. Let's take them individually. Stephanie Stockwell, approximately how often?

A It would be difficult to put a number around it. Depending on the nature of the work, you know, it could be any one of the analysts that I would engage with. So it's very difficult to give you an accurate, you know, once-a-week, twice-a-week-type thing.

Q Okay. Did you have fairly regular interactions with all of the analysts?

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1           A     Yes, I think that's fair to say, yeah.

2           MS. MILLS:   Okay.   Let me ask you to take  
3     a look, please, at what's been marked as Exhibit 10.

4           (Exhibit 10 was marked for  
5     identification by the court reporter.)

6           MR. NONAKA:   Thanks.

7     BY MS. MILLS:

8           Q     And before I ask you about that document,  
9     Mr. Cory, did you have any reason, based on your  
10    interactions with Ms. Stockwell and Ms. Zea, to be  
11    concerned about their work for eBay?

12          A     No.   No, I did not.

13          Q     Okay.   Turning your attention now to  
14    what's been marked as Exhibit 10, does that appear  
15    to be a true and correct copy of an email from  
16    Stephanie Popp to Jim Baugh dated May 19th, 2019?

17          A     Yes, it appears to be.

18          Q     Okay.   And if you take a look at the -- at  
19    that exhibit, there appear to be two attachments.  
20    One is a -- is headed "History, Requirement and  
21    Problem(s)," and then the second appears to be a  
22    PowerPoint deck.

23                Do you see those two attachments?

24          A     I do see them, yes.

25          Q     Okay.   Are you familiar with the

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1 PowerPoint deck?

2 A I mean, I'm familiar in the sense that  
3 it's -- it looks familiar, but I don't recall it  
4 specifically.

5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10 MR. NONAKA: I'm going to --

11 MR. LYNCH: Repeat that question.

12 MS. MILLS: Sure.

13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 MR. NONAKA: So all you're asking Mr. Cory  
22 is whether they appear to?

23 MS. MILLS: Yes.

24 MR. LYNCH: I don't have an objection to  
25 that.

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1 THE WITNESS: Yes. They appear to make  
2 that connection.

3 BY MS. MILLS:

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]

7 MR. NONAKA: Again, to clarify --

8 MR. LYNCH: No objection from the  
9 Department.

10 MR. NONAKA: Right. And -- and --

11 THE REPORTER: I'm sorry. Mr. Lynch, can  
12 you speak louder?

13 MR. LYNCH: Apologize. Jason Lynch,  
14 Department of Justice.

15 No objection from the government to the  
16 question as phrased.

17 MR. NONAKA: And I want to make clear that  
18 all you're asking is whether it appears to as  
19 opposed to it does.

20 MS. MILLS: Yes.

21 MR. NONAKA: Okay.

22 THE WITNESS: Yes, it appears to.

23 BY MS. MILLS:

24 [REDACTED]  
25 [REDACTED]

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2

3

A I do not know that.

4

5

6

7

8

9

A I do not recall a conversation about that.

10

Q Okay. All right. In the course of your work at eBay, did you become aware of a website called EcommerceBytes?

12

13

A Yes, I did.

14

Q What was your understanding generally of what EcommerceBytes was?

15

16

A It was a kind of bulletin-board-type website that discussed -- a lot of eBay users typically posted on, where they provided commentary about the company and about the -- you know, what their life and work on eBay looked like.

17

18

19

20

21

Q Okay. Did you also learn that one of the people who contributed to the EcommerceBytes website was an individual named Ina Steiner?

22

23

24

A Yes, I was aware of that.

25

MS. MILLS: Okay. I'll ask you to take a

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1           A     Yes, it would, yeah. Generally, all --  
2           generally everything is housed on the Internet, yes.

3           Q     Okay. Potentially from books or journals  
4           or other media sources?

5           A     Correct, yeah.

6           [REDACTED]  
7           [REDACTED]  
8           [REDACTED]  
9           [REDACTED]

10          [REDACTED]

11          Q     Did Ms. Alford appear to do what you asked  
12          her to do here?

13          A     She did.

14          Q     In your view, was there anything  
15          inappropriate about your request?

16          A     No.

17          Q     Was there anything inappropriate about the  
18          work that she performed in response?

19          A     There was not.

20          [REDACTED]  
21          [REDACTED]  
22          [REDACTED]

23          [REDACTED]

24          Q     Okay. In the course of your work at eBay,  
25          did you also become aware of a social media user

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1 maybe month- -- maybe monthly.

2 Q And for a time, you reported to Ms. Jones  
3 directly, correct?

4 A For the period after I took over as the --  
5 the senior director role, I did report directly to  
6 Ms. Jones, yes.

7 Q During all your interactions with  
8 Ms. Jones, did you ever observe anything that would  
9 lead you to believe that she directed that anyone be  
10 harassed or threatened?

11 A No, I did not.

12 Q And in all your interactions with  
13 Ms. Jones, did you ever observe anything that would  
14 lead you to believe that she condoned anyone being  
15 threatened or harassed?

16 A No, I did not.

17 Q Are you familiar with a company called  
18 Progressive F.O.R.C.E. Concepts?

19 A Yes, I am.

20 Q Who or what is Progressive F.O.R.C.E.  
21 Concepts?

22 A They are and were a private security  
23 company that we engaged as a contract vendor.

24 Q Were you involved in the selection of  
25 Progressive F.O.R.C.E. Concepts as a contract vendor



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1 for eBay?

2 A Yes, I was.

3 Q What was your involvement?

4 A I -- I led part of the process. I was  
5 involved in prescribing their scope of work and  
6 evaluating their competency to perform that scope of  
7 work.

8 Q At the time they were contracted with  
9 eBay, did you believe that Progressive F.O.R.C.E.  
10 Concepts was competent to perform the work that they  
11 were being engaged to do?

12 A Yes, I did.

13 Q And at the time they were contracted with  
14 eBay, did you believe that Progressive F.O.R.C.E.  
15 Concepts would perform those services legally and  
16 ethically?

17 A Yes, I did.

18 Q Is it fair to say that you supported the  
19 contract with Progressive F.O.R.C.E. Concepts?

20 A Yes, I did.

21 Q From time to time, did you review invoices  
22 submitted by Progressive F.O.R.C.E. Concepts?

23 A Yes.

24 Q And did you approve those invoices?

25 A Yes, I did.

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1           Q     During the course of reviewing and  
2     approving those invoices, did you ever come across  
3     anything that gave you concern that Progressive  
4     F.O.R.C.E. Concepts was engaged in any unlawful  
5     activity?

6           A     No, I did not.

7                     MR. O'CONNOR: Thank you. That's all I  
8     have. We can go off the record.

9                     THE VIDEOGRAPHER: This is the end of  
10    Media 7. We're off the record at 12:40 p.m.

11                    (Discussion Off the Record.)

12                    THE VIDEOGRAPHER: This is the beginning  
13    of Media No. 8. We are going back on the record.  
14    The time is 12:41 p.m.

15                               EXAMINATION

16    BY MR. LISSAUER:

17           Q     Mr. Cory, good afternoon. My name is  
18    Lawrence Lissauer. I don't think you can see me,  
19    but as long as you can hear me, we're okay.

20                    Can you hear me okay, sir?

21           A     Yes, I can, Lawrence.

22           Q     Nice to meet you.

23           A     You too.

24           Q     Mr. Baugh had worked --

25                    MR. NONAKA: Sorry. Mr. Lissauer, can you

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1 THE VIDEOGRAPHER: This is the end of  
2 Media No. 8. We are going off the record. The time  
3 is 1:01 p.m.

4 (Discussion Off the Record.)

5 THE VIDEOGRAPHER: This is the beginning  
6 of Media No. 9. We're going back on the record at  
7 1:02 p.m.

8 EXAMINATION

9 BY MR. WEIGAND:

10 Q Good afternoon, Mr. Cory. Can you hear me  
11 okay?

12 A Yes, I can.

13 Q I know you can't see me, but you're not  
14 missing much, okay?

15 A Okay.

16 Q I think we're almost done, and just be  
17 patient.

18 I represent PFC, one of the many  
19 defendants in the case.

20 A Yes.

21 Q I'm going to try not to repeat anything.  
22 It's a little bit hard. I might end up doing that.  
23 Please know it's not purposeful.

24 As of the summer of 2- -- I want to make  
25 sure I understand your prior testimony.

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1 As of the summer of 2019, you know, the  
2 July and August time period, you were no longer  
3 involved in -- in the supervision or oversight of  
4 the GIC, correct?

5 A Correct.

6 Q And I think, as you explained, that took  
7 place when Mr. Baugh -- I'll call it a  
8 reorganization -- made clear that you were no longer  
9 involved with the GIC, he wanted you elsewhere, and  
10 that the GIC would report directly to Ms. Popp and  
11 himself; is that correct?

12 A That is correct.

13 Q With regard to your knowledge of the GIC  
14 and its operation, is it fair to say the eBay  
15 supervisors would provide daily supervision of the  
16 GIC analysts on a daily basis?

17 A Yes, I think that's fair.

18 Q And as far as their daily tasks or  
19 assignments -- the GIC analysts, that is -- they  
20 would be provided to them by their eBay supervisors?

21 A That is correct, yes.

22 Q And -- and just so we're clear, there are  
23 -- there are direct hires of eBay, and then there  
24 are contractor-loaned analysts; is that correct?

25 A Sorry. If you just -- when -- are you

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1 asking me the distinction between a full-time  
2 employee and a contractor or --

3 Q Alternate workforce, I think it's  
4 referred. Yeah, I just wanted to be clear. Let me  
5 try to be clearer in my question.

6 The GIC analysts that worked at eBay, many  
7 would be direct hires from eBay, and some would be  
8 provided by a contractor or contractors --

9 A Correct.

10 Q -- is that right?

11 A Correct.

12 Q Okay. But in either -- in either  
13 situation, those analysts who were working for eBay  
14 would take their direction and assignments from  
15 their eBay supervisors; fair to say?

16 A Correct, yes.

17 Q PFC, for instance, would not be in any way  
18 involved in directing or controlling the daily work  
19 or assignments the GIC analysts would be doing?

20 A That is correct.

21 Q Do you know whether the GIC analysts were  
22 provided training by eBay?

23 A Yes, I believe they were.

24 Q And would that be at time of their start  
25 or would it be continuing as well?

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1 A I think both.

2 Q All right. And just generally, what kind  
3 of training would eBay provide the analyst?

4 A All contractors were required to go  
5 through the eBay kind of mandatory training syllabus  
6 and then, in addition to that, obviously on-job  
7 training relative to the role they would perform or  
8 the function they would perform.

9 Q And that would be provided by eBay  
10 personnel in charge of such training?

11 A Correct.

12 Q And would eBay also provide all analysts,  
13 and perhaps others, ethics training, to your  
14 knowledge?

15 A I believe it was part of the mandatory  
16 training syllabus, yes.

17 Q And, again, that would be provided by eBay  
18 personnel who provides that kind of training,  
19 correct?

20 A Correct.

21 Q In perhaps stating the obvious, but -- but  
22 as far as the summer of 2019 is concerned,  
23 July-August time period, the work and task and  
24 activities that the GIC analysts would be performing  
25 were under the direction and control and supervision

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1 interaction with PFC. And that interaction also  
2 included dealing with PFC after you assumed the  
3 interim role after the termination of Mr. Baugh; is  
4 that right?

5 A That's correct.

6 Q And could you just generally describe what  
7 your interaction with PFC was at that time?

8 A Are you talking specifically after I  
9 assumed the leadership role?

10 Q Yes. And just in general terms.

11 A Yeah. We continued to work with them as a  
12 vendor. They provided a broad -- broad spectrum of  
13 services from uniformed guarding and executive  
14 protection agents -- I forget which other embedded  
15 employees we may or may not have had at the time,  
16 but they generally continued to be a vendor and a  
17 service provider to us.

18 Q Okay. And did you -- did you deal, at  
19 times, with Steve Krystek?

20 A Yes, I did.

21 Q Okay. And at any point in your  
22 interaction with Mr. Krystek after you assumed the  
23 interim role and after the termination of Mr. Baugh  
24 and others, did you ever talk about those events  
25 involving Mr. -- the Steiners?